

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

JEFFREY L. WAGONER,	)	
as Receiver for	)	
MOON RIDGE FOODS, LLC	)	
	)	
Plaintiff,	)	Case No. 6:22-cv-03084
	)	
v.	)	
	)	
ALANIZ LAW AND ASSOCIATES,	)	
P.L.L.C., RICHARD D. ALANIZ	)	
and BRETT HOLUBECK	)	
	)	
Defendant.	)	

**NOTICE OF SETTLEMENT**

The parties, by and through counsel, hereby provide notice that they have reached a settlement of this matter which the parties have agreed is contingent upon and subject to approval by the Circuit Court of Polk County, Missouri (the “Receivership Court”) where Moon Ridge Foods, LLC is the subject of a receivership. Thus, the parties respectfully request a temporary stay of this matter pending the occurrence of the Settlement Effective Date<sup>1</sup>. The parties will file a joint stipulation of dismissal of this matter, with prejudice, within five (5) business days following the Settlement Effective Date.

/s/ Mary E. Olsen

THE GARDNER FIRM, P.C.  
Mary E. Olsen (OLSEM4818)  
M. Vance McCrary (MCCRM4402)  
182 St. Francis Street, Suite 103  
Mobile, AL 36602  
Telephone: (251) 433-8100  
molsen@thegardnerfirm.com;  
vmccrary@thegardnerfirm.com

/s/ Dustin L. Goldberger

Dustin L. Goldberger, #70080  
Rick C. Wuestling, #30773  
Roberts Perryman, P.C.  
1034 S. Brentwood, Ste 2100  
St. Louis, MO 63117  
Phone: 314-421-1850  
dgolberger@robertsperryman.com  
rwuestling@robertsperryman.com

---

<sup>1</sup> The Settlement Effective Date is defined in the Agreement as the later of (a) the date the Total Settlement Payment is fully funded or (b) the date that the time for taking an appeal of the Receivership Court’s Order granting approval of the Agreement has expired or, in the event an appeal has been taken, the day the Order has been affirmed with no further right of appeal (the “Final Settlement Order”).

Errin P. Stowell, MO Bar #70499  
WM LAW,  
15095 W. 116th St.  
Olathe, KS 66062  
Phone [\(913\) 422-0909](tel:(913)422-0909)  
Fax [\(913\) 428-8549](tel:(913)428-8549)  
stowell@wagonergroup.com

*Attorneys for Defendants*

LANKENAU & MILLER, LLP  
Stuart J. Miller (SJM 4276)  
100 Church Street  
8th Floor  
New York, NY 10007  
P: (212) 581-5005

*Attorneys for Plaintiff*